

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-CV-11923
(DPW)

MARK ZUCKERBERG, and THEFACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**ASSENTED-TO MOTION TO SEAL THE FACEBOOK'S DEFENDANTS'
MEMORANDUM IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO
COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN
RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2, AND
EXHIBITS 2 AND 7 IN SUPPORT THEREOF**

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook, Inc.¹ ("The Facebook Defendants") hereby move to file under seal pursuant to the Stipulated Protective Order entered by the Court in this case, the following

¹ Defendant Eduardo Saverin is represented by separate counsel in this matter.

documents, exhibits and attachments:

1. **MEMORANDUM IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2**
2. **EXHIBITS 2 AND 7 TO THE AFFIDAVIT OF MONTE COOPER IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO COMPEL PARTICULARIZED IDENTIFICATION OF TRADE SECRETS IN RESPONSE TO THE FACEBOOK DEFENDANTS' INTERROGATORY NO. 2**

This motion is necessary to comply with the provisions of the Stipulated Protective Order.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for the Facebook Defendants certifies that pursuant to Local Rule 7.1, the parties have conferred regarding the issues presented by this motion, and counsel for the plaintiff ConnectU and Eduardo Saverin (Troy E. Grabow and Daniel Hampton) consent to the motion.

Dated: September 8, 2005.

Respectfully submitted,

/s/ Monte M.F. Cooper

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